

Wallace  
King  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
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November 05, 2001

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12434

For Professional Services Rendered in Connection with Honeywell Litigation - Matter 6

Professional Services:

		<u>Hours</u>
09/03/01	NAB Scan case pleadings to server.	7.50
09/04/01	AP Conference with B. Hughes regarding trial preparation and pre-trial submissions (.4 hrs.); draft and revise pre-trial statement of disputed legal issues (6.4 hrs.).	6.80
	CHM Prepare fee application.	1.50
	NAB Scan case correspondence to server.	7.50
	PCC Review new Spill Act legislation.	0.30
	WH Conferences with Mr. Marraro and Ms. Pelleter re trial prep tasks and case status meeting with client (.7 hrs.); review recent case correspondence/pleadings and confer with paralegal re filing/organizing same (.8 hrs.); review selected documents for designation as trial exhibits (6.9 hrs.); review recent case law re Spill Act liability (.4 hrs.); confer with Ms.	9.40

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		<u>Hours</u>
	Banks re status of payments to experts (.3 hrs.); confer with expert re assignment (.3 hrs.).	
09/04/01 MM	Office conferences with Ms. Manago re pending assignments to be completed (.2 hrs.); office conferences with Ms. Banks re same (.2 hrs.); office conferences with Ms. Pelletier re various tasks that need to be completed (.3 hrs.); review various pleadings filed by Honeywell and create a list of all admissions Honeywell has admitted to date (2.7 hrs.); draft memorandum to Ms. Pelletier with copy of Honeywell's admitted admissions (.2 hrs.); preliminary review of case documents re flagging all invoices generated to date and produced (4.7 hrs.).	8.30
SRW	Research at Mr. Marraro's request news regarding The Passaic River Restoration Initiative and its impact on cleanup of the Hackensack River.	6.40
BB	Quality check witness' errata sheet and consult with Mr. Hughes email and telephone case expert re same (.5 hrs.); collect and prepare pertinent documents for Mr. Hughes (1.7 hrs.); incorporate new pleadings into case files and create new case files (2.5 hrs.)	4.70
09/05/01 NAB	Refile production documents (.9 hrs.); search for missing production documents to be scanned (1.9 hrs.); re-file production documents (.9 hrs.); scan documents to server (4.7 hrs.).	8.40
BB	Review, analyze new correspondence and case documents and incorporate into case files (5.7 hrs.); research production database for aerial photographs for Ms. Pelletier (4.3 hrs.); collect aerial photographs from case files (.6 hrs.);	10.80

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		<u>Hours</u>
	consult with Ms. Pelletier re aerial photos (.2 hrs.).	
09/05/01 AP	Review case correspondence (.5 hrs.); gather and review Grace invoices in preparation for M. Flax review and conference with M. Moasser re same (2.0 hrs.); revise Statement of Legal Issues, including legal research relating to New Jersey Spill Act (4.0 hrs.).	6.50
CHM	Analyze expert deposition transcripts.	3.50
WH	Conference with Ms. Banks re organizing Honeywell invoices (.3 hrs.); review Honeywell invoices and other cost documents in connection with NCP challenge to costs (3.4 hrs.); review record for relevant DEP correspondence and other documents to be used in challenging Honeywell's IRM, RI and related costs (3.9 hrs.); confer with Ms. Koch re challenge to Todd Delaney (.4 hrs.); confer with Mr. Marraro re trial prep issues (.4 hrs.); work on list of stipulated facts for pretrial order and confer with Ms. Pelletier re same (1.2 hrs.).	9.60
CHM	Prepare interim fee application.	1.20
MM	Office conferences with Ms. Pelletier re various tasks to be completed (.3 hrs.); continue to review case documents re flagging all invoices generated by WRG and D&M (4.8 hrs.); prepare documents for Ms. Flax's review on 9/6/01 (.4 hrs.); review various memorandums drafted pertaining to various task status and incorporate into files (.6 hrs.).	6.10

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		<u>Hours</u>
09/06/01	CHM Review deposition transcripts of experts (1.2 hrs.); prepare response to Honeywell letter re documents (.7 hrs.); prepare for meeting with Grace (1.6 hrs.).	3.50
	WH Review documents produced by Honeywell for designation as trial exhibits (6.7 hrs.); conferences with Ms. Banks re creating database of trial exhibits and selected hot documents (.7 hrs.); review recent case law re CERCLA and RCRA liability issues (.9 hrs.); work on document database (1.2 hrs.); conference with Mr. Schmiermund (.3 hrs.).	9.80
	BB Place calls and send emails to follow up on request from case expert and verify delivery of FedEx shipment of expert's toxicity graphs and supplemental supporting documents for Ms. Pelletier (.8 hrs.); provide guidance and direction to litigation clerk, Ms. Dee Boozer re production scanning project (.4 hrs.); prepare binders for client and local counsel 9/7/01 meeting for Mr. Marraro (1.5 hrs.); review, analyze and organize new case correspondence, bankruptcy and case documents and prepare for incorporation into case files (7.0 hrs.).	9.70
	AP Further revision of list of legal issues as directed by B. Hughes (.5 hrs.); call with M. Golloday of regarding impeachment and cross-exam of Honeywell witnesses (.4 hrs.); conference with M. Moasser and M. Flax regarding Grace damages documentation (.5 hrs.); conference with B. Banks regarding P. Chapman documents and follow-up (.6 hrs.); draft, revise and finalize handouts for 9/7 (4.5 hrs.).	6.50

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		<u>Hours</u>
09/06/01	NAB Scan Documents (Pleadings) onto Server	4.10
	MM Continue to review and flag various invoices paid by Grace and Dames and Moore for damages assessment for pre-trial (10.1 hrs.); office conferences with Ms. Flax re same (.6 hrs.); assist Ms. Flax re drafting preliminary chart reflecting stated invoices (1.1 hrs.); office conferences with Ms. Pelletier re status of same(.2 hrs.).	12.00
	RLS Office conference with Ms. Banks (.6 hrs.); scan charts from Dr. Goad for Ms. Banks; prepare and send scanned documents to Ms. Banks (1.0 hrs.).	1.10
	TP Reviewed incoming case related correspondence related to expert documents.	0.20
09/07/01	WH Review portions of Mr. Walerko's transcript for purposes of designating deposition transcripts for pretrial order.	1.80
	RLS Scan to server several rolls of photos from Ms. Pelletier and experts' site visit.	4.30
	BB Consult with Ms. Campbell re status of Grace Expert invoices and discussions with Ms. Elder (.2 hrs.); collect and prepare documents for Mr. Marraro for conference with client and Local counsel (.4 hrs.); place telephone call to expert in response to Inquires re invoices (.2 hrs.); analyze needs, assess document categories for trial exhibits, plan and create excel trial exhibits collection log, prepare instructions for litigation clerk, Ms. Bynum, and log initial sets of documents (2.8 hrs.); create excel trial exhibits list for attorney review and list exhibits for Mr. Hughes (4.1 hrs.); quality check and prepare additional expert supporting	8.40

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Hours

	documents for shipment to case expert and prepare FedEx cover letter and packages for shipment (.7 hrs.).	
09/07/01 NAB	Pull and copy documents to be used as exhibits for pre-trial and add to index (2.0 hrs.); scan case documents to server (1.7 hrs.).	3.70
AP	Revise statement of legal issues including legal reseach relating to same (1.3); review of documents for inclusion in statement of undisputed facts (5.1).	6.40
CHM	Meeting with clients and J. Agnello (5.5 hrs.); separate meeting with J. Agnello re witnesses (1.5 hrs.).	7.00
MM	Office conferences with Ms. Pelletier re various tasks assigned to me by Ms. Flax (.3 hrs.); review and produce copies of various non-produced Grace invoices per Ms. Flax's request (2.4 hrs.); draft letter with stated invoices and forward to Ms Flax for review (.3 hrs.); various e-mail communications with Ms. Flax re same (.3 hrs.); review all case material and produce copies of all 1990 to 1999 tax payments per Ms. Flax's request; preliminary search and flagging re stated tax documents, pending completion (3.9 hrs.).	7.20
09/08/01 BB	Continue preparation of list of Grace defendants' Trial exhibits for Mr. Hughes.	3.30
09/09/01 WH	Review portions of Mr. Kyles' transcript for purposes of designating deposition transcripts for pretrial order.	1.60
09/10/01 WH	Review documents for designation as trial exhibits (3.4 hrs.); conferences with Ms. Banks re collection of trial exhibits and status of	6.90

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Hours

database (.8 hrs.); review recent case law re statute of limitations issues (.4 hrs.); work on database of trial exhibits (1.9 hrs.); conference with Mr. Davis re his expert work (.4 hrs.).

09/10/01 BB	Follow up on status of Grace expert invoices, create payments to date chart for Mr. Hughes, and make follow-up telephone call to client re same (1.2 hrs.); incorporate new correspondence into indexed case files (6.8 hrs.); place telephone call and email expert re status of inquiries (.2 hrs.); collect pertinent invoice, prepare letter and fax July 2001 expert invoice to Ms. Elder and consult with Mr. Hughes re same (.8 hrs.); provide guidance and assistance to Ms. Bynum re preparation of trial exhibits (.3 hrs.); provide guidance and assistance to Ms. Boozer re organization of case files for attorney review for pre-trial preparation (.7 hrs.).	10.00
AP	Review Mutual product records, health and safety documents for inclusion in pre-trial statement of undisputed facts.	7.50
CHM	Conference call with client re development meeting (.5 hrs.); review expert depositions (2.0 hrs.).	2.50
MM	Per Ms. Flax's request, preliminary search of case material re producing copies of all Grace defendants' tax payments (i.e., 1990-1999 taxes, quarterly statements, etc.).	5.50
NAB	Pull and copy documents to be used as exhibits at trial and add to index (4.3 hrs.); scan case documents to server (3.0 hrs.).	4.50

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		<u>Hours</u>
09/11/01	WH Review transcript and work on cross-examination outline for Mr. Deming.	1.30
	BB Read, analyze, organize and incorporate new case documents and correspondence into existing case files and create new case files.	2.50
	MM Continue to search case material re tax statements requested by Ms. Flax.	1.50
09/12/01	CHM Review damage chart from Carella Byrne (1.2 hrs.); meeting re pre-trial order (.6 hrs.); review case documents (2.5 hrs.); conference call with client (.5 hrs.); conference call with J. Agnello (.3 hrs.).	5.10
	NAB Pull and copy documents to be used as exhibits at trial and add to index.	4.70
	AP Review Mutual documents from period 1951 through 1954.	4.50
	MM Continue to search case material re tax statements and other material requested by Ms. Flax(5.7 hrs.); office conference with Ms. Banks re same and other issues(.2 hrs.).	5.90
	BB Prepare email to Mr. Marraro on status of inquires re Grace expert invoices for Mr. Hughes ( .5 hrs.); continue incorporating new correspondence and documents into existing indexed case files and create new files re deposition errata and signature pages (6.2 hrs.); review, organize and prepare new pleadings re ICO v. Honeywell and bankruptcy for incorporation into case files (.7 hrs.); prepare follow up email to expert re original signature page (.1 hrs.).	7.50



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		<u>Hours</u>
09/12/01	WH Review documents for designation as trial exhibits (2.3 hrs.); work on database of trial exhibits and cross-examination materials (2.7 hrs.); conference with Mr. Brown re trial prep matters (.3 hrs.).	5.30
09/13/01	AP Review Mutual documents for inclusion in list of undisputed facts.	6.50
	MM Continue to search case material re tax documentation and other material requested by Ms. Flax (6.2).	6.20
	BB Collect case documents for Mr. Marraro (3.5 hrs.); brief Mr. Hughes on outstanding invoices for case expert (.2 hrs.).	3.70
	WH Supplement list of legal issues for inclusion in pretrial order and legal research re same (2.8 hrs.); review documents for designation as trial exhibits (2.9 hrs.); work on database of trial exhibits and cross-examination materials (2.2 hrs.); review recent case correspondence (.3 hrs.); conferences with Ms. Banks re status of trial prep assignments (.4 hrs.).	8.60
	NAB Pull and copy documents to be used as exhibits at trial and add to index.	6.50
	CHM Review expert article (.5 hrs.); conference with P. Goad re sampling issues (.6 hrs.); preparation and meeting in New Jersey with Mr. Nagy (6.0 hrs.).	7.10
09/14/01	SRW Research for Mr. Marraro news regarding The Passaic River Restoration Initiative and its impact on cleanup of the Hackensack River.	4.80

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		<u>Hours</u>
09/14/01	MM Continue to search case material re tax documents (3.6 hrs.); produce copies of various tax documents recovered from case material (1.1 hrs.); e-mail to Ms. Banks re guidance re same (.1 hrs.); review e-mail received from Mr. Hughes re trial preparation and proceed to search case material for various reference material as requested (1.6 hrs.).	6.40
	WH Legal research re NCP challenge to Honeywell's costs (1.8 hrs.); review cases re bringing Daubert challenge to NCP expert (.6 hrs.); work on list of stipulated facts for pretrial order (.4 hrs.).	2.90
	BB Hold telephone conference with Ms. Shelnut and Ms. Busbea re strategies and plans for collection and preparation of trial exhibits for Mr. Hughes (.8 hrs.); review case experts' deposition errata sheets and prepare cover letter forwarding same to court reporter and fax to all counsel of record (.8 hrs.); review produced CD of documents relied upon by defendant's expert and arrange for duplication (.6 hrs.); review new case documents, organize, coordinate and create new files (2.3 hrs.); incorporate new correspondence, court filings and case documents into indexed case files (3.3 hrs.).	7.80
	NAB Scan case documents (pleadings & correspondence) to server.	6.80
	CHM Meeting with witness (1.5 hrs.); review deposition transcript of Rifkin for designations (1.5 hrs.); conference call with client (.5 hrs.); review Roned summary judgment motion (.8 hrs.).	4.30

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		<u>Hours</u>
09/17/01	NAB Pull and copy documents to be used as exhibits at trial and add to index (5.8 hrs.); obtain and prepare materials to be shipped to Mr. Goad (2.0 hrs.).	7.80
	WH Legal research re bringing Daubert challenge to Honeywell's experts (2.2 hrs.); work on pretrial order (1.4 hrs.); confer with Ms. Pelletier and Ms. Banks re status of assignments (.6 hrs.); review additional documents produced by Honeywell and confer with Mr. German re same (1.4 hrs.).	5.60
	BB Return call to case expert re deposition signature page (.1 hrs.); consult with Mr. Hughes re details of collection of potential trial exhibits and assignments for case experts (.2 hrs.); make call to expert re notarizing deposition signature page and prepare fax re same (.2 hrs.); prepare letter and materials for FedEx package of deposition and errata sheets for case expert (.5 hrs.); respond to call from case expert re inclusion of defendants' expert documents into database (.2 hrs.); make call to case expert to acknowledge receipt of deposition signature page (.1 hrs.); incorporate new correspondence into indexed case files and create new case files (3.1 hrs.); review new case experts' deposition transcripts, load onto Summation and electronic case files and create new case files (2.6 hrs.).	8.30
09/18/01	AP Review draft briefs on consolidation per Mr. Marraro's request.	0.70
	CHM Analyze expert deposition transcripts for designations (3.2); review letter to Cavanaugh (.5); conference call with client (.6); review	5.00

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		<u>Hours</u>
	transcript from the August 27 status conference (.7).	
09/18/01	WH Legal research re Daubert challenge to Peter Deming (5.8 hrs.); revisions to draft pretrial order (.8 hrs.); conferences with Ms. Banks re status of data base assignment (.7 hrs.); review documents for designation as trial exhibits/cross-examination materials (1.3 hrs.).	8.60
	MM Office conference with Mr. Marraro re working with Ms. Flax on damage issues (.1 hrs.); continue to search case material relating to tax documents to be produced to Ms. Flax (2.3 hrs.); continue to review case material in preparation for producing documents to be used at trial (1.8 hrs.).	4.20
	NAB Pull and copy documents to be used as exhibits at trial and add to index.	6.20
	TP Office conference with Mr. Hughes re status of discovery from Mueser Rutledge and review of prior documents related to dispute.	0.30
	BB Review new correspondence, expert signature page and forward to court reporter (.3 hrs.); consult with Mr. Kaider regarding providing client accessibility to electronic case files (.1hrs.); respond to telephone inquiry from case expert re trial exhibits entries (.1 hrs.); continue entering documents on trial exhibits list for Mr. Hughes (5.9 hrs.); research case file index and compile categories of documents for entry on trial exhibits list (1.3 hrs.).	7.20
09/19/01	WH Review Ms. Koch's deposition transcript and confer with her re corrections to same (4.8 hrs.); review Walerko transcript re transcript designations for pretrial order (2.5 hrs.);	10.30

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Hours

conference with Ms. Parker re Mueser Rutledge documents and letter to Honeywell re same (.2 hrs.); confer with Ms. Banks re status of exhibit list and review/revise draft of same (.9 hrs.); review recent case correspondence (.2 hrs.); legal research re recent amendments to NJ Spill Act (.7 hrs.); review new sampling data and site inspection report produced by Honeywell (.3 hrs.); begin preparing outline of key evidence supporting Grace's RCRA claim against Honeywell (.7 hrs.).

09/19/01	NAB	Pull and copy documents to be used in exhibits at trial and add to index (6.4 hrs.); prepare documents to be shipped to Mr. Goad (2.1 hrs.).	8.50
	AP	Review damages memo and Grace documents relating to proof of damages.	2.50
	TP	Reviewed privilege chart and recent correspondence related to request of documents from Mueser Rutledge; drafted letter to Mr. Caffrey demanding production and emailed draft to Mr. Hughes for review.	1.20
	BB	Review and coordinate new correspondence and pleadings and incorporate into indexed case files (.9 hrs.); prepare and distribute new memo to attorneys (.2 hrs.); consult with Ms. Pelletier re document production CDs and distribute copies (.2 hrs.); continue entering proposed trial exhibits on spreadsheet and consult with Mr. Hughes re same (6.8 hrs.); provide instruction to Ms. Campbell re organization and coordination of documents collected as potential trial exhibits (.6 hrs.).	8.70

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		<u>Hours</u>
09/19/01	CHM Prepare letter to Honeywell re witnesses (.7); conference call with expert re property development (1.5).	2.20
	MM Office conference with Mr. Marraro re status of all damages and other various matters (.2 hrs.); telephone conference with Ms. Flax re same (.1 hrs.); continue to search case material re tax documentation and various other material relating to damages (5.9 hrs.); office conference with Ms. Banks re same (.5 hrs.).	6.70
09/20/01	CHM Review pretrial issues (2.0); review damages memo and conference call re same.	3.50
	TP Email with Mr. Hughes, finalized and sent letter to Mr. Caffrey.	0.40
	BB Consult with Ms. Pelletier re preparation of documents for potential trial exhibits (.1 hrs.); review, analyze, sort, organize and prepare new correspondence, pleadings, deposition materials and documents for incorporation into indexed case files and create new case files (3.3 hrs.); continue organizing and entering documents on draft trial exhibits list (4.8 hrs.); read, sort and organize new filings and correspondence and prepare for incorporation into indexed case file (.5 hrs.).	8.70
	WH Research re Daubert challenges to Honeywell's experts (1.3 hrs.); begin drafting motion in limine (2.8 hrs.); review Honeywell documents in connection with NCP challenge to its response costs (1.7 hrs.); research re challenge to Honeywell's costs on necessity and reasonableness grounds (1.8 hrs.); work on document/trial database (1.2 hrs.).	8.80

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		<u>Hours</u>
09/20/01	MM Office conference with Mr. Marraro re status of damages and arranging telephone conference with Ms. Melissa Flax to discuss same (.1 hrs.); telephone conference with Ms. Flax re same and other various tasks to be completed re same (.3 hrs.); continue to review various case material re producing tax documents and other documents relating to damages and other material to be used at trial (2.4 hrs.).	2.80
	NAB Pull and copy documents to be used in exhibits at trial and add to index.	5.40
09/21/01	MM Office conferences with Mr. Marraro re status of damages and back-up documentation and pending telephone conference with Ms. Flax re same (.3 hrs.); continue to review case documents re producing any and all material supporting damages as requested by Mr. Marraro and Ms. Flax(5.3 hrs.).	5.60
	WH Review Honeywell 30(b)(6) transcripts in connection with designating deposition transcripts for pretrial order (4.6 hrs.); work on in limine motions (2.4 hrs.); review additional documents in connection with NCP/necessity challenge to Honeywell's response costs (1.7 hrs.); research re possible grounds for challenging Honeywell's costs (.8 hrs.).	9.50
	BB Scan new filings incorporate into electronic and indexed case files (.7 hrs.); download and coordinate case docket from Pacer Court Web site (.4 hrs.); collect pertinent information for Mr. Marraro (.2 hrs.); continue review, preparation and listing documents for consideration as trial exhibits for Mr. Hughes (6.2 hrs.).	7.50

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		<u>Hours</u>
09/21/01	NAB Pull and copy documents to be used in exhibits at trial and add to index.	7.50
	CHM Long conference call with experts re exhibits (2.0); conference with Plaintiffs' counsel re experts (.6); prepare letter to Honeywell's counsel re discovery issues (1.0).	3.60
09/22/01	BB Continue preparation of case documents for attorney review for trial exhibits for Mr. Hughes (3.8 hrs.); incorporate new correspondence into indexed case files (.5 hrs.).	4.30
09/23/01	WH Review documents and work on database of trial exhibits and documents for cross-examination.	3.60
09/24/01	NAB Pull and copy documents to be used in exhibits at trial and add to index.	7.80
	BB Continue collecting, preparing and logging case documents for attorney review for trial exhibits for Mr. Hughes (7.6 hrs.).	7.60
	CHM Conference call with client (.4); prepare analysis of witness lists and outline of potential testimony (2.0).	2.40
	WH Collect and review potential trial exhibits and documents for use in cross-examination of Honeywell's expert witnesses (6.6 hrs.); legal research re certain CERCLA and Spill Act equitable allocation factors (2.3 hrs.).	8.90
	AP Draft statement of undisputed facts.	1.00
	MM Office conference with Mr. Marraro re status of damages and conference with Ms. Flax re same (.2 hrs.); continue to review case material and	2.40



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		<u>Hours</u>
	databases re any and all documents relating to damages claimed (2.2 hrs.).	
09/25/01	CHM Work at Carella Byrne on trial preparation.	7.00
	MM Continue to review case material and databases re identifying any and all documents relating to damages (5.4 hrs.); office conferences with Ms. Pelletier re locating summary chart of all summary judgments (.2 hrs.); search case material and case indexes re same(1.1 hrs.).	6.70
	WH Review documents and work on database of trial exhibits and documents for cross-examination.	8.20
	AP Telephone conference with M. Flax regarding pending motions and follow-up re same.	0.50
	NAB Pull and copy documents to be used in exhibits at trial and add to index.	5.80
	TP Telephone call and left message for Mr. Caffrey and email to Mr. Hughes re same.	0.20
09/26/01	TP Reviewed various incoming correspondence including correspondence re outstanding document requests and Honeywell's intent to file responsive brief re same.	0.20
	WH Review documents and work on database of trial exhibits and documents for cross-examination.	7.60
	MM Office conference with Ms. Pelletier re various tasks and case coverage (.2 hrs.); continue to review case material and databases to assure all damage related documents have been disclosed (3.6 hrs.).	3.80

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		<u>Hours</u>
09/26/01	CHM Work on trial preparation issues including expert exhibits (4.2); review expert depositions (2.3).	6.50
	NAB Pull and copy documents to be used in exhibits at trial and add to index.	6.50
09/27/01	NAB Prepare supplemental documents to be sent to Phillip Goad (.7 hrs.); pull and copy documents to be used in exhibits at trial and add to index (4.8 hrs.).	5.50
	WH Review documents and work on database of trial exhibits and documents for cross-examination.	8.40
	TP Prepare memo to Mr. Hughes re status of production of documents from Mueser Rutledge.	0.20
	CHM Lengthy conferences call with P. Goad (1.2); conference call with DEP (.5); prepare response to several Honeywell letters (1.8).	3.50
	MM Continue to review case material for any and all documents relating to damage related issues.	3.70
	BB Respond to telephone inquiry from case expert re collection of documents for review for trial exhibits (.4 hrs.); review case files for pertinent expert supporting sample data and email to case expert (.5 hrs.); continue collecting, preparing and logging documents for review for trial exhibits for Mr. Hughes (8.2 hrs.).	9.10
09/28/01	CHM Conference call with client (.5); conference call with expert re exhibits (.6); conference call with P. Goad (.3).	1.40

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			<u>Hours</u>
09/28/01	WH	Work on <i>Daubert</i> motions.	7.60
	BB	Prepare cover letter and package of deposition exhibits for experts Davis and Brown (.7 hrs.); review and incorporate deposition exhibits into case files (2.8 hrs.); review supplemental production of site maps from defendant, label and incorporate into case files (2.3 hrs.); continue collection and preparation of documents for trial exhibits and review boxes (3.0 hrs.).	8.80
	NAB	Pull and copy documents to be used in exhibits at trial and add to index (4.0 hrs.); scan case documents to server (1.0 hrs.).	5.00
	MM	Office conference with Mr. Marraro re status of damage related issued (.2 hrs.); continue to review case material and case databases re same (4.8 hrs.); office conference with Ms. Pelletier re review case material relating to disputed and undisputed facts requested by Mr. Hughes (.8 hrs.).	5.80
09/29/01	BB	Continue collecting, preparing and listing collected documents for trial exhibits.	5.40
	MM	Continue to review case material and databases re identifying all damage related documents (3.2 hrs.); preliminary review of case material relating to disputed and undisputed facts as requested by Ms. Pelletier (2.8 hrs.).	6.00
			<u>Amount</u>
Total Fees			654.60
09/28/2001	Less Deduction of 40% of Fees Per Agreement		\$130,874.50 (\$52,349.80)
Balance Due			<u>\$78,524.70</u>

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## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	144.00	130.00
Natasha A. Bynum, Legal Clerk	119.70	95.00
Peter C. Condron, Counsel	0.30	335.00
William Hughes, Counsel	144.30	305.00
Christopher H. Marraro, Partner	70.80	420.00
Mahmoude Moasser, Paralegal	106.80	130.00
Tamara Parker, Associate	2.70	260.00
Angela Pelletier, Associate	49.40	200.00
Reilly L. Smith, Paralegal	5.40	115.00
Sean R. Ward, Associate	11.20	165.00

Wallace  
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November 05, 2001

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12434

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>
09/04/01	CHM Review news articles from client (.5 hrs.); conference with client; conference with EPA (1.3 hrs.).	1.80
09/06/01	CHM Review news articles from client (.6 hrs.); conference with client (.7 hrs.); review binder from Latham & Watkins (.7 hrs.).	2.00
09/17/01	CHM Review news articles from J. Davis (.3 hrs.); conference with J. Spinello (.2 hrs.).	0.50
09/21/01	CHM Conference with EPA re meeting (.5 hrs.); conference with client re same (.2 hrs.); review Libby articles from client (.5 hrs.).	1.20
09/27/01	CHM Prepare for and attend conference call re Oct. 1 meeting (1.8 hrs.); prepare letter to EPA re agenda (.5 hrs.); conference with J. Spinello (.5 hrs.).	2.80

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	<u>Hours</u>	
09/28/01 CHM Prepare for meeting with EPA (.4 hrs.); revise Billings memo (.4 hrs.).	0.80	
		<u>Amount</u>
Total Fees	9.10	\$3,822.00
Balance Due		<u>\$3,822.00</u>

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	9.10	420.00

Wallace  
King  
Marraro  
Branson

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November 05, 2001

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12434

For Professional Services Rendered In Connection with Waterloo - Brewer Road Site - Matter 4

Professional Services:

		<u>Hours</u>	
09/23/01	PCC Review Zotos' Notice of Recent Decision (.4 hrs.); legal research regardng new 2nd Circuit case law on successor liability issue (1.2 hrs.); draft Notice of Recent Decision for Grace (.8 hrs.).	2.40	
09/27/01	BB Prepare fax of document to local counsel for Mr. Hughes.	0.40	
			<u>Amount</u>
Total Fees		2.80	\$856.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	0.40	130.00
Peter C. Condron, Counsel	2.40	335.00